

August 2002

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission (FCC)  
445 12<sup>th</sup> Street SW, TW-A325  
Washington, DC 20554

Re: Ultratec's Petition on CapTel - Docket 98-67

As a person who has experienced CapTel through extensive participation in the trial in Maryland, I am sending these comments in support of Ultratec's petition to the FCC on the offering of CapTel service.

I have a severe-to-profound hearing loss and am a journalist by profession. Use of the telephone to conduct interviews is required for my job. While I have the ability to use the telephone independently, I require the use of visual support to conduct lengthy interviews on technical subjects with accuracy. While I have been an enthusiastic user of two-line voice carryover (2LVCO) technology for the past two years, I find that CapTel provides greater functional equivalence in accessing the telephone system and overcomes many of the limitations in the current technology.

Current 2LVCO technology requires the user to go through an elaborate procedure to set up the call by first connecting to the relay service using a computer telephony software and then connecting all parties through conference calling. It also requires the savvy to set up and use telephony software and trouble-shoot bugs in the software. With the dial-through technology available with CapTel, a simple call is simple to set up.

2LVCO is dependent on the typing ability of the relay operator, who are required to type only 60 WPM. CapTel bypasses this limitation by using voice recognition technology, and when used by a skilled relay operator, this more closely approximates the rate of conversational speech. In addition, relay operators are not always familiar with higher-level vocabulary and specific terminology used in business and in various professions. The use of voice recognition technology seems to provide better access to the vocabulary used by professionals and business people.

From my own experience and from talking to other deaf and hard of hearing people, I have found that it is difficult—or impossible—to receive calls by using reverse 2LVCO. Many relay operators do not know how to set up this type of call, particularly when using computer telephony software, and normal hearing people resent being put on hold while the call is being set up. I have never been able to successfully set up a reverse 2LVCO call, and my experience is mirrored by those in other states. I've resorted to setting up appointments for telephone interviews or asking the caller if I can call them right back. CapTel also increases the likelihood of receiving calls via relay because the dialing procedure is simple and requires no interaction with a relay operator.

If CapTel becomes a permanent, full-time service, I believe that it will expand my job opportunities and enhance my quality of life. In closing, CapTel should be recognized by the FCC as a reimbursable TRS service.

Sincerely,

Name  
Address  
Email address